

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

MILLENNIUM FUNDING, INC., *et al.*,

Plaintiffs,

v.

LEASEWEB USA, INC. *et al.*,

Defendants.

Case No.: 1:21-cv-

DECLARATION OF DANIEL ARHEIDT

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Daniel Arheidt, hereby declares under penalty of laws of the United States of America that the following is true and correct:

1. I am over the age of 18 and am competent to make this declaration. This declaration is based upon my personal knowledge and the facts stated therein are true and accurate.

2. I work in the technical department of Maverickeye UG (haftungsbeschränkt) ("MEU"), a company incorporated in Eggenstein and organized under the laws of Germany. MEU is in the business of providing forensic investigation services to copyright owners. As a part of my regular duties I oversee the database and records maintained by MEU.

3. MEU monitors peer-to-peer/BitTorrent networks for acts of distribution of copyright owners' motion pictures through the use of proprietary MaverikMonitor™ software.

4. Members of a swarm broadcast, or register, their Internet protocol ("IP") address with Trackers, hosted by third parties, and Distributed Hash Tables ("DHT's"), generally hosted

by the members of a swarm of peers, to allow them to be located and to locate other members sharing a distinct file.

5. Both Trackers and DHT's are publicly broadcasted resources for anyone who wishes to locate and join a swarm to download a file. Files can be movies, T.V. shows, software or any available information being uploaded or distributed. In essence, Trackers and DHT's are the 'phone books' or lists of IP addresses where uploaders/peers register as being a resource for others to download a specific file, or where they look to find lists of others from whom they may download a file.

6. Agents of the copyright owners engaged MEU to generate and send infringement notices to the Internet Service Providers ("ISPs") assigned the Internet Protocol ("IP") addresses at which MEU confirmed instances of actual observed distribution of copyright owners' motion pictures on the Agents' behalf.

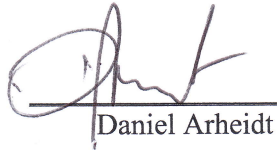
7. MEU stores copies of the infringement notices at or near the time such notices are generated in the course of a regularly conducted activity of business.

8. MEU sent over 32,000 infringement notices to Leaseweb USA through March 18, 2021 concerning infringements at IP addresses indicated as being assigned to Leaseweb per records of the American Registry of Internet Numbers.

9. I have MaverikMonitor evidence logs, and can confirm that MEU logged evidence of infringing activity including times and hash values, that accurately reflects instances of actual observed distribution of the motion pictures at the IP addresses in the infringement notices.

I declare under penalty of perjury under the laws of the United States and Germany that the foregoing is true and correct.

DATED: Eggenstein, Germany, May 25th, 2021.



Daniel Arheidt